

WILLIAM A. ISAACSON (Admitted *Pro Hac Vice*)
(wisaacson@bsfllp.com)
BOIES, SCHILLER & FLEXNER LLP
5301 Wisconsin Ave, NW, Washington, DC 20015
Telephone: (202) 237-2727; Fax: (202) 237-6131

JOHN F. COVE, JR (Admitted *Pro Hac Vice*)
(jcove@bsfllp.com)
BOIES, SCHILLER & FLEXNER LLP
1999 Harrison Street, Suite 900, Oakland, CA 94612
Telephone: (510) 874-1000; Fax: (510) 874-1460

RICHARD J. POCKER #3568
(rpocker@bsfllp.com)
BOIES, SCHILLER & FLEXNER LLP
300 South Fourth Street, Suite 800, Las Vegas, NV 89101
Telephone: (702) 382 7300; Fax: (702) 382 2755

DONALD J. CAMPBELL #1216
(djcc@campbellandwilliams.com)
J. COLBY WILLIAMS #5549
(jcw@campbellandwilliams.com)
CAMPBELL & WILLIAMS
700 South 7th Street, Las Vegas, Nevada 89101
Telephone: (702) 382-5222; Fax: (702) 382-0540
Attorneys for Defendant Zuffa, LLC, d/b/a
Ultimate Fighting Championship and UFC

Additional Counsel Listed on Signature Page

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Cung Le, Nathan Quarry, Jon Fitch, on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Lead Case No.: 2:15-cv-01045-RFB-
(PAL)

Member Case Nos.:

2:15-cv-01046-RFB-(PAL)

2:15-cv-01055-RFB-(PAL)

2:15-cv-01056-RFB-(PAL)

2:15-cv-01057-RFB-(PAL)

**STIPULATION TO FILE A
CONSOLIDATED COMPLAINT AND TO
EXTEND ZUFFA, LLC'S DEADLINE TO
ANSWER PLAINTIFFS'
CONSOLIDATED AMENDED
COMPLAINT ACCORDINGLY**

(First Request)

Luis Javier Vazquez and Dennis Lloyd Hallman, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,

Defendant.

Case No. 2:15-cv-01055 RFB-(PAL)

Brandon Vera and Pablo Garza, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,

Defendant.

Case No. 2:15-cv-01056 RFB-(PAL)

Gabe Ruediger and Mac Danzig, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,

Defendant.

Case No. 2:15-cv-01057 RFB-(PAL)

Kyle Kingsbury and Darren Uyenoyama, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting Championship and UFC,

Defendant.

Case No. 2:15-cv-01046 RFB-(PAL)

STIPULATION

Plaintiffs, Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez, Dennis Hallman, Brandon Vera, Pablo Garza, Gabe Ruediger, Mac Danzig, Kyle Kingsbury and Darren Uyenoyama, and Defendant Zuffa, LLC (collectively, “the Parties”) file this Stipulation To File A Consolidated Amended Complaint And To Extend Defendant Zuffa, LLC’s Deadline to Answer Plaintiffs’ Consolidated Amended Complaint Accordingly.

On September 25, 2015, the Court held a hearing on Zuffa’s Motions to Dismiss each of Plaintiffs’ five substantively identical complaints. On September 27, 2015, Minute Orders were entered denying Zuffa’s Motions to Dismiss each of Plaintiffs’ five complaints. *Le* Dkt. 186, *Vazquez* Dkt. 77, *Vera*, Dkt. 76, *Ruediger* Dkt. 52, *Kingsbury* Dkt. 48.

On October 12, 2015, the parties filed a Stipulation to Extend Defendant Zuffa, LLC’s Deadline To Answer Plaintiffs’ Complaints. (Dkt. 191.) At the November 17th Status Conference, the Court indicated it would grant the stipulation once a corrected image was filed in compliance with Local Rule 6. Because this stipulation renders moot Dkt. 191, the parties will withdraw Dkt. 191.

To promote efficiency, the parties further agree that within thirty (30) days of the entry of an Order approving this Stipulation by the Court, Plaintiffs may file a Consolidated Amended Complaint that consolidates each of the five complaints in *Le*, *Vazquez*, *Vera*, *Ruediger*, and *Kingsbury* into a single consolidated complaint. At this time, Plaintiffs do not seek leave to make substantive changes to the allegations in the proposed Consolidated Amended Complaint, but may reduce the total number of proposed representative plaintiffs.

The Parties further agree that Zuffa may have thirty (30) days from the filing of the Consolidated Amended Complaint to file a consolidated Answer to the Plaintiffs’ proposed Consolidated Amended Complaint. Accordingly, the parties request that the Court enter an Order approving the instant Stipulation To File A Consolidated Amended Complaint And To Extend Defendant Zuffa, LLC’s Deadline to Answer Plaintiffs’

1 Consolidated Amended Complaint Accordingly. The extension will not alter the date of
2 any event or deadline already fixed by Court order. This is the Plaintiffs' first request to
3 file a consolidated amended complaint and Zuffa's second request for an extension of
4 time with regard to its Answers.

5
6
7
8 **ORDER**

9
10 IT IS SO ORDERED:

11
12 _____
13 Hon. Peggy A. Leen

14 UNITED STATES MAGISTRATE JUDGE

15
16 DATED: _____
17
18
19
20
21
22
23
24
25
26
27
28

DATED: November 19, 2015

/s/ Michael Dell'Angelo

Michael Dell'Angelo

Eric L. Cramer

Patrick Madden

BERGER & MONTAGUE, P.C.

1622 Locust Street

Philadelphia, PA 19103

Telephone: (215) 875-3000/Fax: (215) 875-4604

ecramer@bm.net

mdellangelo@bm.net

pmadden@bm.net

**WOLF RIFKIN SHAPIRO SCHULMAN &
RABKIN, LLP**

DON SPRINGMEYER, ESQ.

Nevada State Bar No. 1021

BRADLEY SCHRAGER, ESQ.

Nevada State Bar No. 10217

DANIEL BRAVO, ESQ.

Nevada State Bar No. 13078

3556 East Russell Road, Second Floor

Las Vegas, NV 89120

Telephone: (702) 341-5200

Fax: (702) 341-5300

**COHEN MILSTEIN SELLERS & TOLL,
PLLC**

Benjamin D. Brown

Richard A. Koffman

Hiba Hafiz

1100 New York Ave., N.W., Suite 500, East

Tower Washington, DC 20005

Telephone: (202) 408-4600/Fax: (202) 408 4699

bbrown@cohenmilstein.com

rkoffman@cohenmilstein.com

hhafiz@cohenmilstein.com

JOSEPH SAVERI LAW FIRM, INC.

Joseph R. Saveri

Joshua P. Davis

Matthew Weiler

Kevin E. Rayhill

505 Montgomery Street, Suite 625

San Francisco, California 94111

Telephone: (415) 500-6800/Fax: (415) 395-9940

DATED: November 19, 2015

/s/ John F. Cove, Jr.

JOHN F. COVE, JR.

(Pro Hac Vice granted)

(jcove@bsflp.com)

BOIES, SCHILLER & FLEXNER LLP

1999 Harrison Street, Suite 900

Oakland, CA 94612

Telephone: (510) 874-1000

Fax: (510) 874-1460

WILLIAM A. ISAACSON

(Pro Hac Vice granted)

(wisaacson@bsflp.com)

BOIES, SCHILLER & FLEXNER LLP

5301 Wisconsin Ave, NW

Washington, DC 20015

Telephone: (202) 237-2727

Fax: (202) 237-6131

RICHARD J. POCKER #3568

(rpocker@bsflp.com)

BOIES, SCHILLER & FLEXNER LLP

300 South Fourth Street, Suite 800

Las Vegas, NV 89101

Telephone: (702) 382 7300

Fax: (702) 382 2755

DONALD J. CAMPBELL #1216

(djcc@campbellandwilliams.com)

J. COLBY WILLIAMS #5549

(jcw@campbellandwilliams.com)

CAMPBELL & WILLIAMS

700 South 7th Street

Las Vegas, Nevada 89101

Telephone: (702) 382-5222

Fax: (702) 382-0540

*Attorneys for Defendant Zuffa, LLC, d/b/a
Ultimate Fighting Championship and UFC
Attorneys of Record for Defendant Zuffa,
LLC, d/b/a Ultimate Fighting Championship
and UFC*

jsaveri@saverilawfirm.com
jdavis@saverilawfirm.com
mweiler@saverilawfirm.com
krayhill@saverilawfirm.com

**WARNER ANGLE HALLAM JACKSON &
FORMANEK PLC**

Robert C. Maysey
Jerome K. Elwell
2555 E. Camelback Road, Suite 800
Phoenix, AZ 85016
Telephone: (602) 264-7101/Fax: (602) 234-0419
rmaysey@warnerangle.com
jelwell@warnerangle.com

**LAW OFFICE OF FREDERICK S.
SCHWARTZ**

Frederick S. Schwartz
15303 Ventura Boulevard, #1040
Sherman Oaks, CA 91403
Telephone: (818) 986-2407/Fax: (818) 995-4124
fred@fredschwartzlaw.com

**SPECTOR ROSEMAN KODROFF &
WILLIS, P.C.**

Eugene A. Spector
Jeffrey J. Corrigan
William G. Caldes
1818 Market Street – Suite 2500
Philadelphia, PA 19103
Telephone: (215) 496-0300/Fax: (215) 496-6611
espector@srkw-law.com
jcorrigan@srkw-law.com
jcohen@srkw-law.com
wcaldes@srkw-law.com

*Attorneys for Individual and Representative
Plaintiffs Cung Le, Nathan Quarry, Jon Fitch,
Luis Javier Vazquez, Dennis Lloyd Hallman,
Brandon Vera, Pablo Garza, Gabe Ruediger,
Mac Danzig, Kyle Kingsbury, and Darren
Uyenoyama*

ATTESTATION OF FILER

The signatories to this document are myself and Michael Dell'Angelo, and I have obtained Mr. Dell'Angelo's concurrence to file this document on his behalf.

Dated: November 19, 2015

BOIES, SCHILLER & FLEXNER LLP

By: /s/ John F. Cove, Jr.
John F. Cove, Jr. (*Pro Hac Vice*)
1999 Harrison Street, Suite 900
Oakland, CA 94612
Tel: (510) 874-1000
Fax: (510) 874-1460
Email: jcove@bsflp.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that service of the foregoing **STIPULATION TO FILE A CONSOLIDATED COMPLAINT AND TO EXTEND ZUFFA, LLC'S DEADLINE TO ANSWER PLAINTIFFS' CONSOLIDATED AMENDED COMPLAINT** **ACCORDINGLY** was served on November 19, 2015 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ Suzanne Jaffe

An employee of Boies, Schiller & Flexner, LLP